UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA FORT LAUDERDALE DIVISION

CASE NO. 00-6027-CR-ZLOCH Magistrate Judge Seltzer (Chief MJ Snow set bond)

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Plaintiff, v.

JOHNNY POWELL,

Defendant.



MOTION TO MODIFY BOND TO EXTEND TRAVEL

COMES NOW, the defendant, by and through the undersigned attorney, and files his unopposed Motion To Modify Bond To Extend Travel, and states as follows:

- 1. The defendant is charged by indictment with five counts of tax evasion.
- 2. On February 7, 2000, Chief Magistrate Judge Snow set bond in the amount of \$75,000, personal surety bond. The conditions of the bond limited the defendant's travel to the Southern District of Florida. The defendant is being supervised by the Pre-trial Services Office.
- 3. The defendant is a native of Daytona Beach, Florida. His mother, as well as numerous relatives live in the Daytona Beach area. The defendant travels regularly to Daytona Beach to visit family and would like to continue to do so. Consequently, the defendant respectfully requests that the Court modify the conditions of his bond to allow his travel to include the Middle District of Florida.

The undersigned has discussed this motion with AUSA Robin Rosenbaum who 4. authorized the undersigned to represent to the Court that the Government has no objection to the Court granting this motion. The undersigned was unable to reach PTS officer Kathv Shannon-Hunt to discuss her position on this motion.

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WHEREFORE the defendant prays that the Court grant this motion and extend the defendant's travel to the Middle District of Florida.

Respectfully submitted,

KATHLEEN M. WILLIAMS FEDERAL PUBLIC DEFENDER

By:

Assistant Federal Public Defender

Florida Bar No. 868795

Attorney for Defendant

101 N.E. Third Avenue, Suite 202 Fort Lauderdale, Florida 33301

(954) 356-7436 / 356-7556 (Fax)

CERTIFICATE OF SERVICE

I certify that copy of the foregoing motion was mailed on this $\frac{10^{-4}}{10^{-4}}$ day of February. 2000, to Robin Rosenbaum, Assistant United States Attorney, 299 East Broward Boulevard, Fort Lauderdale, Florida 33301.